

November 7, 2016

### **VIA ECFS**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Knology Total Communications, Inc. Challenge to CenturyLink's Connect America Fund Phase I, Round 2 Notice of Incremental Support Election WC Docket No. 10-90

Dear Ms. Dortch,

Pursuant to the Wireline Competition Bureau's ("WCB") September 23, 2016 Public Notice<sup>1</sup>, Knology Total Communications, Inc. ("Knology" or the "Company") hereby provides notice to CenturyLink and the WCB that 5 census blocks for which CenturyLink seeks incremental Connect America Fund ("CAF") Phase I, Round 2 support are located completely within Knology's rate-of-return study area. In order to avoid providing support to providers to serve census blocks that already have service by another provider, the Federal Communications Commission ("FCC") created a challenge process that has been used effectively in many proceedings. Providers are now to challenge CenturyLink's proposal to claim CAF support in census blocks that are actually served by a competitor. Knology is an incumbent local exchange carrier that already serves census blocks, or is the incumbent in census blocks, where CenturyLink seeks CAF support. Knology believes that these census blocks were inadvertently included on CenturyLink's proposed list, because the blocks are entirely within Knology's regulated study area (see map in Appendix A). Therefore, CenturyLink's request to use CAF Phase I, Round 2 support to extend service to the blocks listed below should be denied.

Knology is providing this letter to CenturyLink, which serves as notice that the Company already provides service in the census blocks in question, and therefore CenturyLink will not be able to certify that the locations in the census blocks listed in Appendix A are unserved to the best of its knowledge.

I hereby certify that the above statements are true to the best of my knowledge.

<sup>&</sup>lt;sup>1</sup> Wireline Competition Bureau Announces Deadline for Existing Providers to Notify CenturyLink that They Serve Census Blocks that CenturyLink Proposes to Serve with Connect America Phase I Incremental Support, Public Notice, WC Docket No. 10-90, DA 16-1072 (rel. Sept. 23, 2016) ("Public Notice").

Respectfully submitted,

Arlene Morgan, Director of Regulatory

WOW, Inc. parent company of

### Enclosure

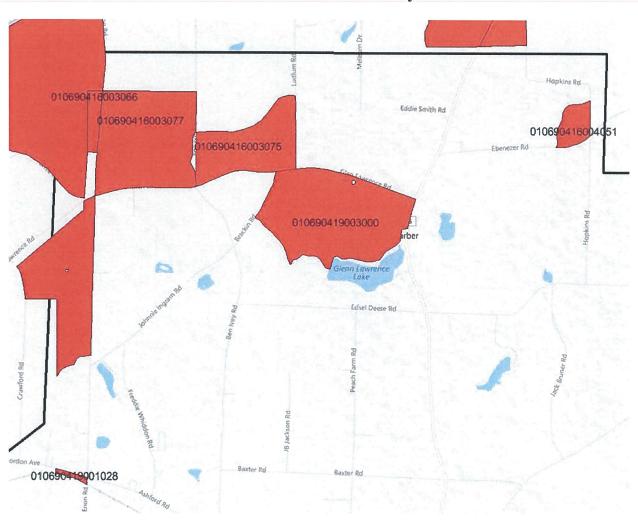
cc: Heidi Lankau, Wireline Competition Bureau

Jeffrey Lanning, Vice President Federal Regulatory Affairs, CenturyLink

### APPENDIX A

# CENSUS BLOCKS ALREADY SERVED BY KNOLOGY TOTAL COMMUNICATIONS, INC.

## Census Blocks Inside ILEC Study Area



### **CERTIFICATE OF SERVICE**

I, Cassandra Heyne, hereby certify that a true and correct copy of the foregoing Notice of Knology Total Communications, Inc. was served on this 7<sup>th</sup> day of November, 2016, via courier, to CenturyLink's representatives, as follows:

Jeffrey Lanning Vice President – Federal Regulatory Affairs 1099 New York Avenue NW Suite 250 Washington, DC 20001

/s/ Cassandra Heyne
Cassandra Heyne, Consultant
JSI
Authorized Representative for Knology Total
Communications, Inc.